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NPDES Storm Water & Pesticide General Permits Overview

September 20, 2018

NPDES Construction General Permit (CGP)

- “General” permit under EPA jurisdiction
- Soil disturbance > 1 acre
- Part of a Common Plan (multiple related projects) > 1 acre
- Each LANL project obtains individual permit coverage
 - Currently 18 permitted projects
- Permit coverage requires Storm Water Pollution Prevention Plan (SWPPP) and Notice of Intent (NOI) with a 14-day waiting period
 - Both require certification (signature)
- Areas in need of Improvement:
 - Incorporating CGP required activities into project planning & execution
 - Execute CGP compliance in a proactive instead of reactive manner

NPDES Multi-Sector General Permit (MSGP)

- “General” permit under EPA jurisdiction
- Regulates specified industrial activities (i.e., machine shops, power plant, vehicle maintenance, asphalt batch plant, recycling facility)
- 66 LANL facilities subject to MSGP
- Permit coverage requires Storm Water Pollution Prevention Plans (SWPPP) and a Notice of Intent (NOI) with a 30-day waiting period
- Current challenges with use of EPA electronic reporting system
- Areas in need of improvement:
 - Increased understanding of MSGP requirements and implementation of corrective actions by deployed and operational personnel
 - Increased consistency among FOD personnel in executing permit requirements
 - Timely & appropriate corrective action response to meet permit requirements

NPDES Pesticide General Permit (PGP)

- “General” permit issued under the Clean Water Act under EPA jurisdiction
- Regulates point source discharges of pesticides (herbicides and insecticides) to Waters of the United States
- Permit coverage requires development of a Pesticide Discharge Management Plan(PDMP) and submittal of a Notice of Intent (NOI) to EPA with a 10-day waiting period
- PDMP components include: Site maps, thresholds for pesticide applications, facility contacts and spill response procedures
- NPDES PGP requirements include:
 - Monitoring for adverse incidents
 - Submittal of an annual report to EPA